



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/RMP/AS
F. #2021R00600

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 15, 2025

By Email and ECF

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Re: United States v. Sun, et. al.
Criminal Docket No. 24-CR-346 (S-2) (BMC)

Dear Counsel:

This letter will be accompanied by a link, sent by separate e-mail, to the secure download of certain discovery materials produced pursuant to Rule 16 of the Federal Rules of Criminal Procedure. The government renews its request for reciprocal discovery from the defendants.

The following documents were recently obtained by the government during the course of the investigation or recently authorized for production:

Bates No.	Description of Item
EDNY_143705-EDNY_144726	Records from the New York State Commission on Ethics and Lobbying in Government
EDNY_144727-EDNY_145148	Records from DocuSign, Inc.

Four sets of records produced by DocuSign, Inc. appeared to relate to the retention of legal services, and although the government understands that these records are not privileged, in an abundance of caution the government deleted them promptly. These records are not included in the production and the government has not maintained any copies.

You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling us to arrange a mutually convenient time.

Very truly yours,

JOSEPH NOCELLA, JR.
United States Attorney
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By: /s/ Alexander A. Solomon
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